

**Teeth Shaving Policy**

US FED COURT PUERTO RICO

Verified COMPLAINT

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24-CV-1279 SCC

EMMETT CALDWELL plaintiff  
 vs  
 EXAVIER BECERRA;  
 DEPARTMENT OF HEALTH AND HUMAN SERVICES;  
 BLUE CROSS BLUE SHIELD;  
~~TRIPLE S INSURANCE MANAGEMENT CORPORATION~~  
 HEALTHCARE; DENTIST NAZARIO;\*  
 DENTAL ASSISTANT (unidentified) JUANITA DOE defendants.

Jurisdiction US Government Defendant USC 42 1983 over 75,000.00

THE FOLLOWING IS SWORN TRUE UNDER LAWS AND OATH AND PENALTY OF PERJURY **AFFIANT**

THIS ACTION IS DUE TO UNAUTHORIZED DENTAL SHAVING PRACTICING DAMAGE  
 Cause of Action PLAINTIFFS 7 TEETH DRILLED CAUSING SEVERE EXTREM PAIN SUFFERING

A) 12/28/23 PLAINTIFF A REFORMER PLACES COVERED PATIENT HAD 8 TEETH DRILLED SHARPENED UNNECESSARILY BY HEALTH CARE PROS JUANA DOE UNIDENTIFIED DENTAL ASSISTANT INTENTIONALLY DAMAGED TO CAUSE PERMANENTLY PAIN AND INJURIES LEADING TO TEETH SURGERY EXTRACTIONS DIRECTLY PROXIMATELY DUE TO FAILURE TO ORDER A NO DENTAL SHAVING POLICY BY HEALTH AND HUMAN SERVICES AND ITS DIRECTOR EXAVIER BECERRA

APPROXIMATELY

Aa) DECEMBER 28 2023 PLAINTIFFS 7-8 TEETH WERE IRREPARABLE DAMAGED BY UNNEEDED DENTAL SHAVING BY PRO HEALTHCARE DENTAL ASSISTANT JUANA DOE USEING DENTISTS DRILL TO SHAVE OFF SHARPEN TEETH TOPS AND ENAMAL AFTER DENTIST LEFT SHARPENING PLAINTIFFS 7 -8 TEETH MALISHOUSLY FOR NO LEGAL REASON CAUSEING PERMANANTLY INJURIES AND INTENSE CONSTANT PAINS AND STARTING KNOWN PROCESS OF TEETH DEGRADATION AND LOSS REQUIREING 8 SURGICAL AND DENTAL PROCEEDURES APPROX \$40000.00

Aa) ALL DEFENDANTS ARE GROSS NEGLIGENCE BY RECKLESS FAILURE TO HAVE A 'NO DENTAL SHAVING' POLICY TO PREVENT FORSEEABLE INJURIES TO PREVENT PLAINTIFFS PERMANANT INJURIES TEETH PAINS AND PAIN ON EATING BY FORSEEABLE NOTORIOUS DENTAL TEETH SHAVING VIOLENCE BY DRILLING AWAY TOOTH AND ENAMAL OF NON TREATED TEETH BY DENTAL ASSISTANT JUANA DOE UNRELATED TO TEETH DENTIST IS TREATING AND ARE JOINTLY SEPERATELY LIBAL FOR PLAINTIFFS INJURYS

Ab) HEREIN AFTER RESTATED BY WORDS THE DEFENDANTS ARE 1)EXAVIER BECERRA 2)DEPARTMENT OF HEALTH AND HUMAN SERVICES;3)BLUE CROSS BLUE SHIELD;4)TRIPLE S INSURANCE CO;5)HEALTH CARE PRO,6)DENTIST NAZARIO; 7)JUANITA DOE (WHO MALISHOUSLY "DENTAL SHAVED" DRILLING PLAINTIFFS 7-8 TEETH CAUSEING FORSEEABLE AND INTENDED PERMANANT DAMAGES AND SEVERE CONSTANT TEETH PAIN AND SUFFERING REQUIREING PUNETIVE DAMAGES AS A DETERANT

~~TRIPLE S MANAGEMENT CORP IS HERINN AFTER RESTATED BY WORD TRIPLES~~

Ac) ALL DEFENDANTS ALLOWED FORSEEABLE HENIOUS TORTUROUS VIOLENT "DENTAL SHAVEING" DRILLING BY FAILING TO PROHIBIT IT FAILED TO PROPERLY TRAIN AND SUPERVISE JUANA DOE IGNORED FORSEEABLE HARMS SHE INFILCTED PLAINTIFF SUFFERED AND KNEW OR SHOULD HAVE KNOWN AND ANTICIPATED THE FORSEEABLE INJURIES AND HARMS PLAINTIFFS TEETH SUFFERED FAILING TO HAVE POLICY PREVENTING DENTAL SHAVING

Ad) ALL DEFENDANTS RECKLESSLY IN GROSS NEGLIGENCE DIRECTLY PROXIMATELY CAUSED PLAINTIFFS TEETH INJURIES BY POLICY NOT PROHIBITING UNEEDED TEETH SHAVING DRILLING RECKLESSLY BY UNSUPERVISED NEGLIGENTLY TRAINED DENTAL ASSISTANT TEETH OTHER THAN THOSE DENTIST SPECIFIED AND INTENDED MIGHT BE ALSO DRILLED BY IMPROPERLY TRAINED AND UNSUPERVISED DENTAL ASSISTANT IF NO POLICY TO SPECIFICALLY PROHIBITED ADDITIONAL DRILLING DUE TO ALL DEFENDANTS GROSS NEGLIGENCE RECKLESS DISREGARD OF HARMS

Ac) PLAINTIFF WAS THE ONLY NON PUERTO RICAN PATIENT AND HIS 7-8 TEETH TOPS WERE INTENTIONALLY SHARPENED DOWN TO CHRONIC TOOTH PAIN AREA ESPECIALLY ON COLD AIR OR FOOD AND WALKING BY JUANITA

DOE PERMANANTLY DESTROYING TOOTH AND ENAMAL INTENTIONALLY MALISHOUSLY

A1) AS A DIRECT RESULT PLAINTIFFS 7-8 TEETH BEING UNNECESSARILY SHAVE SHARPENED DRILLED NONE WHICH WERE SUBJECT OF DENTIST PROCEEDURE ON ONE UPPER TOOTH # PLAINTIFF SUFFERS SEVERE UNBARABLE CONSTANT NERVE AND 7 TEETH PAIN ON WALKING EATING ALSO DRINKING CHILLED OR HOT ALSO REGULAR TEMPATURE FOOD

A2) ALL DEFENDANTS GROSS NEGLIGENCE RECKLESS IGNOREING FORSEEABLE PROBALE HARM BY NOT HAVING A POLICY OF PREVENTING TEETH SHAVING A KNOWN PRACTICE DE FACTO AUTHORIZED JUANA DOE TO DAMAGE PLAINTIFFS TEETH NOT SUBJECT OF DENTISTS PROCEEDURE CAUSEING PERMANANT LOSS OF TOOTH AND ENAMAL AND RESULTANT SEVER PAINS AND BEGINNING OF CERTAIN TEETH DEGENERATION AND NERVE DAMAGES REQUIREING SURGERYS AS PLAINTIFF SUFFERED AND SUFFERS PERMANANTLY AND WILL SUFFER COSTLY DENTAL SURGERY

B) ALL DEFENDANTS ARE RESPONDANTS SUPERIOR LIBAL FOR FAILING TO HAVE NO TOOTH SHAVING POLICY AND TO PROPERLY TRAIN AND SUPERVISED DENTAL ASSISTANT JUANA DOE WHO IRREPABLE DAMAGED PLAINTIFFS TEETH INTO PERMANANTLY PAIN BY DRILLING AWAY TEETH AND ENAMAL IRREPARABLY DE FACTO DENTAL VIOLENCE REQUIREING TITLE 1s14 DETERANT DAMAGES

C) PLAINTIFF INFORMED DENTIST IN PRESENCE OF DENTAL ASSISTANT JUANA DOE HE WAS OF CHRISTIAN SCIENCE RELIGION THAT DID NOT ALLOW INJECTIONS OR SURGICAL PROCEEDURES AS ROOT CANAL

CLAIM FOR RELIEF 17 MILLION AND A ORDER DEFENDANTS NO DENTAL SHAVING POLICY BE IMPLEMENTED

#### Cause of Action

1 ) DEPARTMENT OF HEALTH AND HUMAN SERVICES IS RESPONDANT SUPERIOR LIBAL FOR PLAINTIFFS INJURYS AND PAIN FAILING DUTY OWED BY NOT PROPERLY TRAINING AND SUPERVISING ALL DEFENDANTS IT CONTRACTS SUPERVISES AND MANAGES AS MEDICAIRE MEDIACAD THAT CONTRACTS BLUE CROSS BLUE SHIELD WHICH SUBCONTRACTS TRIPLE SSS HEALTHCARE WHICH CONTRACTED HEALTH CARE MED DENTIST NAZARIO ALL WHO BY GROSS NEGLIGENCE RECKLESS DISREGARD OF FORSEEABLE HARMS DIRECT PROXIMATELY CAUSED PLAINTIFFS INJURYS ALL ARE DEFENDANTS WHO FAILED FORSEEABLE DUTY TO PROPERLY TRAIN AND SUPERVISE TO PREVENT IRREPARABLE HARM BY ALLOWING DENTAL ASSISTANT TO DRILL AWAY IRREPLACEABLE TOOTH AND ENAMAL TEETH NOT SUBJECT OF DENTISTS PROCEEDURE WHICH FORSEEABLE WOULD CAUSE PLAINTIFFS SEVER CONSTANT PAIN PERMANENT TEETH AND EVENTUALLY GUM INJURYS

1A) PLAINTIFF WAS SUBJECT OF HENIOUS MALISHOUS DENTAL TORTURE INVOLVING DRILLING OFF TOP OF 7 TEETH TO REMOVE TOOTH AND ENAMAL WHICH DRILLING WAS DE FACTO INTENDED DAMAGES FOR NO LEGAL PURPOSE WITH DRILL WAS GUARANTEED TO EXPOSE THE NERVE TO TORTOUS PAIN FROM COLD FOOD DRINK AND AIR KNOWN TO LEAD TO TOOTH REQUIRING ROOT CANAL PROCEEDURE EVENTUALLY ONLY POSSIBLE MOTIVE

1B) PLAINTIFF WENT TO HEALTH PRO MED 2020 AVE BORINQUEN FOR DENTAL CHECKUP ON OR ABOUT DEC 28 2023 A MEDICADE MEDICARE TRIPLE SSS HEALTH PROVIDER WITHOUT ANY TOOTH PAIN BUT LEFT WITH PAIN DIRECT PROXIMATELY DUE TO DENTIST NAZARIO WHO EXAMINED X RAYED MY TEETH THEN STARTED A UPPER TOOTH TEETH REPAIR PROCEEDURE THEN LEFT JUANA DOE TO COMPLETE TREATMENT FAILING DUTY OWED TO PREVENT DRILLING OF TEETH NOT PART OF DENTISTS TREATMENT IN GROSS NEGLIGENCE OF FORSEEABLE HARMS DIRECT PROXIMATELY CAUSEING PERMANANTLY IRREPARABLE INTENSE PAIN DUE TO TOPS OF 5 UPPER AND 2 LOWER TEETH TO BE DRILLED OFF INTO SHARP SHAPE DESTROYING TOOTH AND ENAMAL (exhibit)

1C) ALL THE DEFENDANTS RESTATED INCORPERATED HERE BY REFRENCE FAILED FORSEEABLE DUTY OWED TRAIN AND SUPERVISE DENTAL TECHNICAN JUANA DOE WHO AFTER DENTIST LEFT DRILLES AWAY TOOTH BONE AND ENAMAL OF TOPS OF FIVE TEETH AND TWO BOTTOM INTO SHARPENED ANIMAL LIKE EDGE DESTROYING TEETH AND ENAMAL OF TEETH DENTIST DID NOT INTEND TO TREAT DIRECT PROXIMATE CAUSE OF SEVERE CONSTANT UNBEARABLE TEETH PAIN AND BREAKAGE OF LOWER TOOTH #

1D) DENTIST NAZARIO AND ALL DEFENDANTS FAILED TO PROPERLY TRAIN AND SUPERVISE DENTAL ASSISTANTS WHO FOR THE BENEFIT OF ALL DEFENDANTS DO EXTRA DENTAL WORK AFTER DENTIST LEAVES THEM WITHOUT

LIMITING INSTRUCTIONS DRILLED ALL APPROX 6 UNAFFECTED TEETH PERMANANTLY DAMAGING ALL

1E) AS A DIRECT PROXIMATE RESULT OF ASSISTANTS DRILLING OFF MY APPROX 7 TEETH AND ENAMAL ARE IRREPARABLE DAMAGED AND DESTROYED CANNOT BE REPLACED

1F) DOCTORS HOSPITAL PRESCRIBED PAIN MEDICATION DUE TO PLAINTIFFS TEETH EXTREM PAINS DIRECTLY PROXIMATELY CAUSED BY GROSS NEGLIGENCE MALISHOUS Heinous DECIETFUL TRIPLE SSS DENTAL CARE

1G) IT IS 330 am AND I CANT SLEEP DUE TO CONSTANT EXTREM PAIN IN UPPER AND LOWER DRILLED TEETH DIRECT PROXIMATE CAUSED BY ALL DEFENDANTS GROSS NEGLIGENCE

1H) DR PRESCRIBED PAIN MEDICATION DUE TO CONSTANT PAINFUL TEETH PAIN DIRECT PROXIMATELY COMPLAINED DRILLING CAUSED

1I) BLUE CROSS BLUE SHIELD CONTRACTED WITH TRIPLE SSS TO PROVIDE THE COMPLAINED INJURIOUS DENTAL TREATMENT DAMAGES

1J) THERE WAS NO REASON TO DRILL AWAY TOP OF THE 6-7 TEETH BONE AND ENAMAL EXCEPT TO MALISHOUSLY FORSEEABLE CAUSE IRREPARABLE PERMANANT HARM AND TORTUOUS TOOTH PAIN BEING SUFFERED

1K) DEPARTMENT OF HEALTH AND HUMAN SERVICES IS IN CHARGE OF MEDICARE THAT CONTRACTED TRIPLE S HEALTH THAT CONTRACTED HEALTH PRO MED ALL LIBAL FOR FAILING TO TRAIN AND MONITOR DENTIST AND DENTAL ASSISTANT TO PREVENT UNNEEDED DRILLING OF PLAINTIFFS TEETH DIRECT PROXIMATE CAUSE OF IRREPARABLY DAMAGEING TEETH AND ENAMAL AND SEVERE TEETH PAINS

1L) DAMAGE DEFENDANTS CAUSED TO PLAINTIFFS TEETH BY UNNEEDED DRILLING CANNOT BE RESTORED TO PRE DAMAGE CONDITION PERMANANT PAIN IS DIRECT PROXIMATE RESULT THEREOF AND ACCELLERATED DETERIATION LEADING TO EVENTUAL TEETH LOSS

1M) HEALTH CARE PRO JUANNA DOES DENTAL DRILLING WAS FOR THE BENEFIT OF THE DEFENDANTS FORSEEABLE TO REQUIRE PLAINTIFF TO RETURN TO CAUSE ADDITIONAL BILLING TO MEDICARE MEDICAID FINANCIAL BILLING

1N) PARAGRAPH A RESTATED INCORPORATED HERE BY REFRENCE

1M) PARAGRAPH Aa RESTATED INCORPORATED HEREIN BY REFRENCE

1N) PARAGRAPH Ab RESTATED INCORPORATED HEREIN BY REFRENCE

1O) PARAGRAPH A c RESTATED INCORPORATED HERE BY REFRENCE

1P) PARAGRAPH Ad RESTATED INCORPORATED HEREIN BY REFRENCE

CLAIM FOR RELIEF

17 MILLION AND A ORDER NO DENTAL SHAVING POLICY BE IMPLEMENTED

CAUSE OF ACTION

1Q) ON OR ABOUT FEBURARY 8 I WENT TO THE DENTIST FOR A CHECK UP AT THE TRIPLE SSS MEDICAL PROVIDER PRO HEALTH CARE DESIGNATED LOCATED AT

2020 AVE BORIQUEN TRIPLE S HEALTH CARE DIRECTLY PROXIMATELY CAUSED PERMANANTLY INJURYS AND PAIN BY GROSS NEGLIGENCE POLICY ALLOWING DENTADRILL SHAVING OF TEETH BY DENTAL ASSISTANT JUANA DOE TO DENTAL SHAVE OFF AND SHARPEN TOP OF MY 6 TOP TEETH AND 2 LOWER (exhibit) RESPONDANT SUPERIOR DONE FOR TRIPLES BENEFIT TO ACCE HARARIE & CAUSE TOOTH DAMAGE DECAY REQUIRING ADDITIONAL DENTAL SERVICES & BILLING

1R) I TRUSTED THE ADVERTISED TRIPLE SSS PROFESSIONAL REPUTATION TO MY DETRIMENT ALLOWING THE DENTIST <sup>JUANA</sup> <sub>RIO</sub> AND DENTAL ASSISTANT TO DO WHATEVER DENTAL PROCEEDURES NECESSARY RESULTING IN CONSTANT PAINFUL TEETH INJURYS DUE TO UNNEEDED DENTAL DRILLING & SHAVING 7 TEETH NOT PRIOR NEEDING ANY DENTAL TREAT MENT NOW REQUIRING \$ 25-50,000.00 DENTAL TREATMENTS TO REPAIR PERMANANT IRREVERSABLE INJURY & DAMAGES

2) X RAYS WERE TAKEN AND THE DENTIST EXAMINED MY TEETH AND STARTED PROCEEDURE TO ADD A PASTE TO MY UPPER TOOTH CAVITY ~~AND DRILL CAVITY AREA ONLY 1 TOOTH WAS TO BE TREATED FF & (Exh.b.1)~~

3) THE DENTIST ASKED IF I WANTED TO BE SEDATED WHICH SEEMED ODD SINCE IT WAS NO INJECTION PROCEEDURE

4) THE HEALTH PRO MED DENTIST ( 2020 AVE BORIQUEN )DENTIST NAZARIO STARTED USEING A DRILL THEN LEFT DRILLING ECT TO THE TECHNICAN A FEMALE TO DO THE REST AND LEFT THE DENTAL AREA PERMENANTLY

5) I TRIED TO NOT MOVE AS I COULD NOT SPEAK ECT AFTER DRILLING STARTED

6) I TRUSTED THAT THE DENTAL TECHNICAN WAS PROPERLY INSTRUCTED TRAINED AND SUPERVISED BY THE DENTIST AND TRIPLE SSS  
~~TO MY DETRIMENT DUE TO TRIPLE SSS AND HEALTH & HUMAN SERVICES ADVERTISED  
SAFE TREATMENT MISREPRESENTATIONS~~

7) I WAS IN A PANIC EXTREM DURESS STATE DUE TO THE UNCOMFORTABLE CLAMPED OPEN MOUTH BRIGHT LIGHT AND DRILLING NOISE HAVING TO NOT OBJECT TO DENTAL PROCEEDURE AS CUSTOMARY

8 THE DENTAL ASSISTANT DRILLED MY TEETH AWAY INTO A SHARP KNIFE LIKE PATTERN ALL 5 OF THE MY TEETH OFF AT THE TOP AND TWO LOWER TEETH SO MY TEETH ARE NOW TWO COLORED WHITE WHERE DENTAL BONE AND ENAMAL DRILLED AWAY

9) I WAS VERY ALARMED WHEN THE DENTAL ASSISTANT PUT HEAVY PRESSURE ON LOWER TOOTH THAT BROKE OFF HOURS LATER AND RETURNED FOR EMERGENCY APPOINTMENT I MISSED

10) I INFORMED THE RECEPTIONST MY TEETH WERE DRILLED INTO DOG LIKE SHAPE AND HURT AND LOWER BROKE AND I NEEDED 2ND EMERGENCY APPT BUT SHE SAID YOU HAVE REGULAR APPT THAT AFTER I MISSED

11) I INFORMED TRIPPLE SSS BUT THEY DID NOT TAKE COMPLAINT ON TWO OCCASSIONS PLAZA OFFICE IN MARCH APRIL I MADE COMPLAINT AND A PHOTO GOT A CALL FROM TRIPLE SSS INVESTIGATOR

12)DIRECT PROXIMATE CAUSE OF INJURYS AND PAIN IS TRIPLE SSS RESPONDANT SUPERIOR FAIED DUTY OWED TO PROPERLY TRAIN AND SUPERVISE DENTIST AND DENTAL ASSISTANT IN GROSS NEGLIGENCE AND RECKLESS DISREGARD OF THE FORSEEABLE HARMS FAILED TO TRAIN AND SUPERVISE THEIR DENTIST AND ASSISTANT TO PREVENT MY TEETH BEING DRILLED THAT WERE NOT PART OF THE PROCEEDURE CAUSEING EXTREM UNBEARABLE PERMENANTLY IRREPAREABLE Injury AND CONSTANT EXCRUCATEING TEETH PAINS AND SUFFERING

12A) PARAGRAPH 14 IS RESTATED INCORPERATED HERE BY REFRENCE

12C) PARAGRAPH A RESTATED INCORPERATED HERE BY REFRENCE

12D) PARAGRAPH Aa~~A~~ RESTATED INCORPERATED HERE BY REFRENCE

12E) PARAGRAPH A~~B~~ RESTATED INCORPERATED HERE BY REFRENCE

12F) CLAIM FOR RELIEF 10.5 MILLION DOLLARS

#### CAUSE OF ACTION

13) BLUE CROSS BLUE SHIELD CONTRACTED WITH TRIPLE S TO PROVIDE DENTIST SERVICE PER PLAINTIFFS PLAN COVERAGE DIRECT PROXIMATE CAUSE OF PLAINTIFFS INJURYS ~~FAILING DUTY OWED TO FORBID DENTAL SHAVING DRILLING ON UNAFFECTED TEETH CAUSING SEVERE PAIN & SUFFERING~~

13A) BLUE CROSS BLUE SHIELD IS RESPONDANT SUPERIOR LIBAL FOR FAILURE TO PROPERLY TRAIN AND SUPERVISE ALL DEFENDANTS THAT FOR THIER BENEFIT PROVIDED COMPLAINED DENTAL TREATMENT AND DAMAGES COMPLAINED DIRECT PROXIMATE CAUSE OF PLAINTIFFS INJURYS AS STATED IN PARAGRAPH RESTATED BY REFRENCE

13B) BLUE CROSS BLUE SHIELD FAILED DUTY OF CARE OWED AND ADVERTISED BY ALLOWING UNNEEDED TEETH DRILLING RECKLESSLY IN GROSS NEGLIGENCE HENIOUS DISREGARD OF PROBABLE HARM DIRECTLY PROXIMATELY ALLOWED AND CAUSED PLAINTIFFS 7 UNAFFECTED TEETH TO BE DRILLED INTO SHARP DOG TEETH FORSEEABLEY

CAUSEING PERMANENTLY EXCRUCIATEING PAIN AND SUFFERING *A PRACTICE TO ACCELERATE NEED FOR ADDITIONAL DENTAL BILLING & VISITS TO DENTISTS*

13C) BLUE CROSS BLUE SHIELD HAD PRIOR NOTICE OF DENTIST PROVIDERS DAMAGING TEETH BY UNEEDED DRILL SHAVING PROCECDURES AND FAILED DUTY OWED TO PREVENT INJURYS COMPLAINED IN PARAGRAPH. A RESTATED HERE BY REFRENCE GROUNDS FOR PUNETIVE DAMAGES

13D) PARAGRAPH A RESTATED INCOPERATED HEREIN BY REFRENCE

13E) PARAGRAPH Aa RESTATED INCOPERATED HEREIN BY REFRENCE

CLAIM FOR RELIEF 10.5 MILLION AND A MOTION FOR PUNETIVE DAMAGES

CAUSE OF ACTION

14) PARAGRAPH A RESTATED INCOPERATED HEREIN BY REFRENCE

14A) PARAGRAPH Aa RESTATED INCOPERATED HEREIN BY REFRENCE

*14B PARAGRAPH RESTATED INCOPERATED HERE BY REFRENCE  
14C PARAGRAPH RESTATED INCOPERATED HERE BY REFRENCE*

15B) TRIPLE SSS HEALTH CARE IS RESPONDANT SUPERIOR DIRECT PROXIMATELY LIBAL FOR ALLOWING ITS CONTRACTED HEALTH CARE PRO AND DENTIST NAVZERO AND DENTAL TECHNICAN JUANA DOE TO UNNECESSARILY IRREPARABLY DRILL APPROX 5 UPPER AND 2 LOWER TEETH DESTROYING TOOTH AND ENAMAL IRREPARABLY

*DENTAL & SHAVING FOR SEEABLE FOR BENIFT TO CAUSE ADD VISITS & BILLING*

15C) DENTIST NAVRIO EXAMINED MY TEETH AND MADE XRAYS AND FILLED A CAVITY AND LEFT LETTING JUANA DOE CONTINUE DRILLING WITHIUT ANY LIMITING INSTRUCTIONS IN GROSS NEGLIGENCE RECKLESS DISREGARD OF FORSEEABLE HARMS DUE TO FAILURE TO TRAIN AND SUPERVISE TECHNICAN LEFT ME IN THE CARE OF THE FEMALE DENTAL TECHNICAN

WHO DRILLED THE TOP OF MY FIVE TEETH AWAY INTO A SHARP ANIMAL LIKE POINTED SHAPE PERMANANTLY DESTROYING THE TEETH AND ENAMAL AND THEN DRILLED HARD 1 LOWER TOOTH CAUSEING IT TO BREAK IN TWO (EXHIBIT. )

DIRECT PROXIMATE CAUSE OF PERMANT IRRPARABLE INJURYS AND EXTREEM CONSTANT UNBEARABLE TEETH PAINS AND SUFFERING, HEADACHES REQUIRING PAIN MEDICATION & DENTAL EXPENS

15D) PARAGRAPH 1 RESTATED INCOPERATED HERE BY REFRENCE

16) PARAGRAPH 2 RESTATED INCOPERATED HEREIN BY REFRENCE

17) PARAGRAPH 3 RESTATED INCOPERATED HEREIN BY REFRENCE

18) PARAGRAPH 4 RESTATED INCOPERATED HERE BY REFRENCE

19) PARAGRAPH 5 RESTATED INCOPERATED HERE BY REFRENCE

20) PARAGRAPH 6 RESTATED INCOPERATED HERE BY REFRENCE

21) PARAGRAPH 7 RESTATED INCOPERATED HERE BY REFRENCE

22) PARAGRAPH 8 RESTATED INCOPERATED HERE BY REFRENCE

23) PARAGRAPH 9 RESTATED INCOPERATED HERE BY REFRENCE

24) PARAGRAPH 10 RESTATED INCOPERATED HERE BY REFRENCE

25) PARAGRAPH 11 RESTATED INCOPERATED HEREIN BY REFRENCE

26) PARAGRAPH 12 RESTATED INCOPERATED HEREIN BY REFRENCE

26A) PARAGRAPH A RESTATED INCOPERATED HEREIN BY REFRENCE

26B) PARAGRAPH Aa RESTATED INCORPORATED HEREIN BY REFRENCE

27) CLAIM FOR RELIEF 10.5 MILLION DOLLARS

CAUSE OF ACTION

28) MEDICADE MEDICARE IS LIBAL FOR NOT ORDERING A NO DENTAL SHAVING POLICY BY ITS TRIPLE S HEALTH CARE AND HEALTH CARE PRO DENTAL PROVIDER IS LIBAL FOR INJURYS SUFFERED DUE TO PRO HEALTH CARE DENTAL ASSISTANT JUANA DOE UNEEDED DENTAL SHAVING OFF SHARPENING TOPS OF PLAINTIFFS 8 TEETH AFOREMENTIONED IN PARAGRAPH. 14A RESTATED HERE BY REFRENCE

28A) MEDICADE MEDICARE GROSS NEGLIGENTLY DIRECTLY PROXIMATELY CAUSED PLAINTIFFS DENTAL INJURYS BY FAILING TO HAVE POLICYS PREVENT DENTAL SHAVING AND SHARPENING TEETH CAUSEING INJURYS SUFFERED

28B) MEDICADE MEDICARE HAS IGNORED DUTY OWED TO IMPLEMENT POLICY OF NO DENTAL SHAVING SHARPENING OF TEETH BY ITS HEALTH CARE PROVIDER DESPITE PRIOR NOTICE OF THE PRACTICE IN RECKLESS DISREGARD OF FORSEEABLE HARMS

FAILED DUTY OWED TO PROPERLY TRAIN AND SUPERVISE ITS DE FACTO DENTIST AND DENTAL TECHNICAN JUANNA DOE

28C MEDICADE MEDICARE HAS RECIVED PRIOR COMPLAINTS OF ITS SERVICE PROVIDERS AND DENTIST ECT PERFORMING 'DENTAL SHAVING' ON TEETH NOT SUBJECT OF DENTIST TREATMENT UNNEEDED DENTAL PROCEEDURES GROSS NEGLIGENTLY FAIL DUTY OWED RELIED ON FAILING TO PREVENT THE UNEEDED DRILLING DIRECT PROXIMATELY CAUSEING PLAINTIFFS PERMANANTLY IRREPAREABLE INJURYS SUBJECT OF THIS ACTION AND CONSTANT PERMANANTLY EXTREEM UNBEARABLE PAIN PLAINTIFF WILL SUFFER FOR THE REST OF HIS LIFE

28D) MEDICADE MEDICARE ALLOWS DENTAL SHAVING POLICYS UN NEEDED DENTAL DRILLING DAMAGES GROSS NEGLIGENTLY RECKLESS MALISHOUSLY DIR XT CAUSE OF PLAINTIFFS INJURYS

29) PARAGRAPH. A RESTATED INCORPORATED HERE BY REFRENCE

30 ) PARAGRAPH Aa RESTATED INCORPORATED HEREIN BY REFRENCE

31) PARAGRAPH 3 RESTATED INCORPORATED HEREIN BY REFRENCE

32) PARAGRAPH 4 RESTATED INCORPORATED HERE BY REFRENCE

CLAIM FOR RELIEF  
17 MILLION DOLLARS

WHEREFORE

PLAINTIFF DEMANDS 17.5 MILLION ALSO APPROPRIATE ORDERS . . .

DATED 4/18/24

  
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